

1 Michael C. Lieb (SBN 126831)
mlieb@ecjlaw.com
2 Zoe M. Vallier (SBN 324324)
zvallier@ecjlaw.com
3 **ERVIN COHEN & JESSUP LLP**
9401 Wilshire Boulevard, Twelfth Floor
4 Beverly Hills, California 90212-2974
Telephone: (310) 273-6333
5 Facsimile: (310) 859-2325
6 Attorneys for Plaintiff
CATALINA YACHTS, INC.
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

10
11 CATALINA YACHTS, INC., a
California corporation,
12
Plaintiff,

13 v.

14 SHARON DAY, an individual;
15 GERARD DOUGLAS, an individual;
and DOES 1 through 10, inclusive,
16
Defendant.

Case No. 2:25-cv-04090-SVW-RAO
Assigned to The Hon. Stephen V.
Wilson

**DECLARATION OF MICHAEL C.
LIEB IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
AMENDED MOTION TO
TRANSFER VENUE PURSUANT
TO 28 U.S.C. § 1404(a)**

*[Filed concurrently with Opposition to
Amended Motion to Transfer Venue and
Declaration of Russell L. Berney]*

Date: July 14, 2025
Time: 1:30 p.m.

Action Filed: May 7, 2025
Trial Date: None Set

DECLARATION OF MICHAEL C. LIEB


I, Michael C. Lieb, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Ervin Cohen & Jessup LLP, attorneys of record for Plaintiff Catalina Yachts, Inc. (“Catalina”). I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe that they are true. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Plaintiff’s Opposition to Amended Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a).

2. I met and conferred with counsel for Sharon Day (“Day”) regarding Day’s anticipated motion to transfer venue, as well as Day’s request for an extension of time to respond to the Complaint. In Day’s Motion, she states that I admitted that the Bonus Compensation Agreement obligation was triggered. *See* Motion, at p. 10. This is not true, and mischaracterizes the conversation. The only thing I “admitted” is what is already alleged in the Complaint, that Defendants had satisfied the 7 ½ year employment condition required to qualify for bonuses. This fact is not disputed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 23rd day of June, 2025, at Beverly Hills, California.


Michael C. Lieb